

DRAFT Environmental Assessment

Proposed Land Acquisition– Milltown Park Parcels

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1.0 PURPOSE OF AND NEED FOR ACTION

1.1. Proposed Action and Need

Montana Fish, Wildlife and Parks (FWP) proposes to purchase via fee title the 180-acre, four-parcel, Milltown Park property from The Nature Conservancy (TNC) located near the town of Bonner, Montana. The community of Bonner is in Missoula County, about 5 miles east of Missoula along the Interstate Highway 90 corridor.

The proposed acquisition is the first step in a larger project for the confluence area of the Clark Fork and Blackfoot Rivers. The Milltown Park project is a multi-year project to redevelop and restore the Milltown Dam and Reservoir area to provide a site that combines recreation opportunities, heritage tourism, and environmental education that serves as a new catalyst of economic opportunity for the Milltown and Bonner communities. The entire concept plan for Milltown Park can be accessed at http://www.co.missoula.mt.us/wq/MilltownDam/MilltownRedevelopment/pdfs/Final_Concept_Plan_Report.pdf (2008; accessed 27 Oct 2010).¹

This initial step calls for the acquisition of the four TNC parcels near Bonner, the Blackfoot River, and the Milltown Dam overlook by FWP. These parcels are in addition to the 450+ acres of NorthWestern Energy lands that are scheduled to come to FWP as the core of the state park and would enhance the overall plans for the park. The size and location of the parcels are as follows (Fig. 1):

- Parcel #1, locally known as Bonner Hill, is east of the Bonner School and is approximately 102 acres;
- Parcel #2 is just north of Bonner, north of the Blackfoot River across from the former Stimson Lumber Company Mill and is approximately 47 acres;
- Parcel #3 is west of Milltown, near the Milltown Dam overlook near the Clark Fork River and is approximately 19 acres; and
- Parcel #4 is just northeast of Parcel 1, straddling Montana Highway 200, and south of the Blackfoot River and is approximately 11 acres.

All of these parcels were owned by various timber mills (Bonner, Anaconda Company, etc.) that had existed in Bonner and Milltown since the late 1890s and most recently by Plum Creek Timber Company prior to December 2008. Because of the parcels' close proximity to the mills, all have been logged at one time or another. Currently, all the parcels are forested in a mix of conifers and limited quantities of aspen and larch, with Parcels 2 and 4 bordering the Blackfoot River and with riparian species present such as willow and other herbaceous plants.

Threats to these parcels include the potential development of residential and recreational homes because of their close proximity to the communities of Bonner, Milltown, West Riverside, and Missoula, as well as a their natural views of the valley and confluence area, and for Parcel 2, river frontage on the Blackfoot River.

¹ Website for Milltown Dam and associated information is <http://www.co.missoula.mt.us/wq/MilltownDam/index.htm> (accessed 27 Oct 2010).

The proposed action would meet the redevelopment core values drawn from the 2005 Concept Plan approved by Missoula County:

1. Maintain the majority of the area in a natural setting.
2. Foster diverse, free, and safe public river access and recreational opportunities compatible with the natural environment of the area.
3. Provide educational opportunities and facilities that allow people of all ages to learn about the history of the area and restoration efforts.

1.2 Objectives of the Proposed Action

- Provide lasting public access to currently accessible lands and nonmotorized trail connectivity;
- Make available recreation and outdoor classroom opportunities to local residents;
- Permanently protect riparian and wildlife habitat; and
- Replace lost and injured natural resources that were the subject of Montana v. ARCO.

1.3. Location

The Milltown Park parcels are located approximately 5 miles east of Missoula, Montana.

Legal Descriptions:

Parcels 1, 2, and 4: Sec.22, T13N, R18W in NW4 of River, Gov. Lots 1&2, SE4, PT SW4 SW4 in Sec. 22, 13-18 less tracts

Parcel 3: Sec.20, T13N, R18W, Platt C&D, East of Deer Creek Road



Figure 1. Outlined in yellow are the Milltown Park parcels to be acquired from TNC by FWP.

1.4 Relevant Plans

Milltown/Two Rivers Park Conceptual Design Plan details the design plan to create a new state park at the confluence of the Clark Fork and Blackfoot Rivers after the removal of the Milltown Dam and the restoration work of the reservoir area is completed (Milltown Superfund Site Redevelopment Working Group, 2008).

FWP Comprehensive Fish & Wildlife Management Strategy

During the last century, riparian habitats have declined in Montana, as a result of timber harvesting, water diversion, noxious weed invasions, and residential development. The 132-mile Blackfoot River is identified in the Montana's Comprehensive Fish and Wildlife Conservation Strategy (2005), as 1 of 5 Aquatic Focus Areas in the state. The Blackfoot River supports two community types of greatest conservation need (Tier 1 community types; intermountain/foothill grassland and riparian & wetland) as well as five Tier 1 species, including the endangered bull trout.

The table below lists Montana Species of Concern (SOC) and Threatened/Endangered species (US Fish and Wildlife Service status under the Endangered Species Act) that have been observed on the property or are predicted to occur within the vicinity (Montana Natural Heritage database, accessed 8 Oct 2010).

Table 1. Montana Species of Concern and Threatened/Endangered Species observed or expect to occur on the four TNC parcels proposed for acquisition by FWP.

Common name <i>Species</i>	Status*	Habitat	Status in Vicinity of Parcels
<u>Species of Concern</u>			
Bull Trout <i>Salvelinus confluentus</i>	Threatened, SOC, Tier 1	Mountain streams, rivers, and lakes	Uses the Blackfoot River near Parcels 2 and 4 as a migratory corridor.
Westslope Cutthroat Trout (<i>Oncorhynchus clarki lewisi</i>)	Sensitive, SOC, Tier 1	Coldwater streams	Uses the Blackfoot River near Parcels 2 and 4 as a migratory corridor.
Canada Lynx (<i>Lynx Canadensis</i>)	Threatened, SOC Tier 1	Subalpine conifer forests	The area has low quality lynx habitat.
Fisher (<i>Martes pennant</i>)	SOC, Tier 2	Mixed conifer forest	The area has low quality fisher habitat.
Gray Wolf (<i>Canis lupus</i>)	Endangered north of I-90, Threatened South of I-90	Generalist	No known den or rendezvous sites on the parcels.
Hoary Bat (<i>Lasiurus cinereus</i>)	SOC, Tier 2	Conifer and riparian forests	Suitable habitat, no surveys have been done to document presence/absence.
Wolverine (<i>Gulo gulo</i>)	SOC, Tier 2	Conifer forests	The area has low quality wolverine habitat. Potential movement area, not verified.
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	Delisted, SOC, Tier 1	Riparian forests	Nest sites at east Missoula and upper end of former Milltown Reservoir, not close to any of the properties, > 1 mile away.
Clark's Nutcracker	SOC, Tier 3	Conifer forests	Birds present & probably use all of

Common name Species	Status*	Habitat	Status in Vicinity of Parcels
(<i>Nucifraga Columbiana</i>)			the parcels.
Flammulated Owl (<i>Otus flammeolus</i>)	SOC, Tier 1	Low-mid elevation conifer forests with large trees	Parcel 1 provides the best habitat for this species. Verified nesting on ridges to the west and north of Milltown. Foraging habitat on Parcels 1, 3, & 4.
Great Blue Heron (<i>Ardea Herodias</i>)	SOC, Tier 3	Riparian woodlands	Rookery located at the upper end of the former Milltown Reservoir near the old RR bed, not very close to any of the properties.
Northern Goshawk (<i>Accipiter gentilis</i>)	SOC, Tier 2	Mixed conifer forests	Foraging habitat on all parcels. Potential nesting habitat on Parcels 1 & 3.
Pileated Woodpecker (<i>Dryocopus pileatus</i>)	SOC, Tier 2	Moist conifer forests	Best habitat on Parcels 1 & 3.
Peregrine Falcon (<i>Falco peregrinus</i>)	Delisted, SOC, Tier 2	Cliffs, forages over riparian, wetland habitats	Bonner nest site is located just off the NE corner of Parcel 2. Development of this site will need to consider potential impacts on this aerie.
Veery (<i>Catharus fuscescens</i>)	SOC, Tier 2-3	Riparian forests, shrubby habitats	Documented using riparian shrub habitat in the Milltown Reservoir area.
Winter Wren (<i>Troglodytes troglodytes</i>)	SOC, Tier 2	Moist conifer forests	Suitable habitat in area, not verified.
Western Skink (<i>Eumeces skiltonianus</i>)	SOC, Tier 2	Rock outcrops	Suitable habitat, not verified.
Western Toad (<i>Bufo boreas</i>)	SOC, Tier 2	Wetlands, lakes, floodplain pools	Verified in the Turah area, may use uplands adjacent to Clark Fork and Blackfoot rivers.
A. Millipede (<i>Adirityla cucullata</i>)	SOC	Dry mixed conifer forest clearings	Unknown
A. Millipede (<i>Austrotyla montani</i>)	SOC	Mixed conifer forests	Unknown
A. Millipede (<i>Corypus cochlearis</i>)	SOC	Mixed conifer forests	Unknown
<u>Potential Species of Concern</u>			
Barrow's Goldeneye (<i>Bucephala islandica</i>)	PSOC, Tier 3	Wetlands	Documented to occur in the area during migration.
Hooded Merganser (<i>Lophodytes cucullatus</i>)	PSOC, Tier 2	Rivers and riparian wetlands	Documented to occur in the area during migration. Potential breeding habitat in oxbow wetlands along the Clark Fork River upstream of the former dam site.
An Ice Crawler (<i>Grylloblatta campodeiformis</i>)	PSOC		Unknown due to its nocturnal habits and activity at temperatures just above freezing.

*Tier 1 status identifies those species in greatest conservation need.

Missoula County Growth Policy serves as a planning guide for local officials and citizens, which is reviewed at least once every five years after adoption. The most recent update of the policy was

completed in 2005. It provides a long range statement of local public policy defining guidance for managing and accommodating development within the county (December 2006).

Missoula County Parks and Conservation Lands Plan is meant to guide citizens, the County Park Board, and the Board of County Commissioners in their work to improve and maintain park lands within Missoula County (1997).

Missoula County Zoning Resolution establishes districts wherein compatible uses of land may be located and grouped to create, protect, or maintain a quality environment for the citizens of the County of Missoula (updated 2007).

1.5 Authority and Responsibility

FWP has the authority to purchase lands that are suitable for game, bird, fish or fur-bearing animal restoration, propagation or protection; for public hunting, fishing, or trapping areas; and for state parks and outdoor recreation per Montana state statute § 87-1-209, Montana Code Annotated (MCA).

Per state law, § 87-1-201(9), MCA, FWP is required to implement programs that address fire mitigation, pine beetle infestation, and wildlife habitat enhancement giving priority to forested lands in excess of 50 contiguous acres in any state park, fishing access site, or wildlife management area under the department's jurisdiction. FWP would develop and implement forest management plans for this property to meet the intent of this statute.

FWP is also required to deposit 20% of the purchase price, capped at \$300,000/acquisition, for properties it acquires (§§ 87-1-209 and 23-1-127(2), MCA). Such an account would be used for weed maintenance, fence installation or repair of existing fences, garbage removal, implementation of safety and health measures required by law to protect public, erosion control, streambank stabilization, erection of barriers to preserve riparian vegetation and habitat, and planting of native trees, grasses, and shrubs for habitat stabilization. Such maintenance activities should be consistent with the Good Neighbor Policy (23-1-126 MCA).

2.0 ALTERNATIVES

2.1. Alternative A--Proposed Action: For FWP to purchase four parcels totaling approximately 180 acres from The Nature Conservancy

FWP proposes to purchase via fee title approximately 180 acres near Bonner, Montana, to complete the first step in the redevelopment of the confluence area of the Blackfoot and Clark Fork Rivers into a new state park.

FWP and the Milltown Superfund Redevelopment Working Group and Missoula County have applied for and been approved for an Upper Clark Fork River Basin Restoration Grant for approximately \$2.6 million for the establishment of a public park through the acquisition of these four parcels, development of park facilities, and resources for the park's initial operations and maintenance. The grant funds would come from the Montana Natural Resource Damage Program (NRDP). This program has been responsible for performing natural resource damage assessments, pursuing the lawsuit against ARCO, and administering funds from the settlement. The 1999 partial settlement earmarked approximately

\$130 million to restore or replace the injured natural resources in the Upper Clark Fork River Basin. In general, restoration funds can be used on projects that will improve:

- Natural resource-based recreational opportunities such as hunting, fishing, hiking and wildlife watching
- Water, fish and wildlife resources
- Public drinking water supplies

The grant amount available for the purchase of the four Milltown Park parcels is capped at \$1,080,000. A survey and appraisal are being completed by TNC and are anticipated to be finalized before the State Land Board meeting in December. The appraisal would provide the final purchase price of the four parcels from TNC (at a combined value not to exceed \$1,080,000), and the survey would provide more accurate boundary descriptions and acreages for the parcels and would provide Parcels 3 and 4 for separate conveyance to FWP.

In order to meet a NRDP funding condition, FWP will work with NRDP to place a deed restriction with reversionary clause on the Bonner Hill parcel (Parcel 1) to ensure that tract's perpetual use as open space and conservation lands to protect the existing natural resources.

After FWP acquires the four TNC parcels, FWP would transfer title to the 102-acre Bonner Hill parcel (Parcel 1) to the Bonner School District. The District has expressed interest in obtaining the property for use as an outdoor classroom, where children could be involved in physically active field-based education programs covering biology, field ecology, and forest management. At the time of transfer of Bonner Hill, FWP would retain a trail easement to support the future development of a community-wide trail system on the property. The District would assume the responsibility of the parcel's management and maintenance expenses.

Challenges for FWP related to the proposed acquisition include: Oversight of Parks Division management strategies and priorities, the long-range operation and maintenance of the parcel and infrastructure improvements, ensuring adequate levels and emergency response services, and enforcement of FWP rules throughout the parcels for protecting public safety, park facilities, and resource values. Estimated 5-year operations and maintenance expenses are \$656,200 for weed management, fencing, maintenance of grounds, equipment and facilities, signage, day-to-day operations, contracted services, dedicated park equipment, and salaries for two full-time employees to oversee the new park. Anticipated immediate expenses include the installation of appropriate signage (FWP identification, public use rules and regulations, etc.), ongoing noxious weed management, and limited boundary marking and fencing.

Funding for operations and maintenance expenses for the first 5 years has been funded through the NRDP grant. FWP has begun investigating and discussing funding options for the long-term operation of the park, including the establishment of a not-for-profit organization for fundraising activities.

Since FWP would be reimbursed for the actual operations and maintenance (O&M) expenses by the NRDP instead of being given the grant funds for deposit into a designated maintenance account, FWP believes it is in compliance with § 87-1-209, MCA because the amount of O&M funding proposed to be

reimbursed to FWP by NRDP over the life of the project *equals or exceeds* 20% of the purchase price or the cap of \$300,000, whichever is less.

The proposed acquisition is the first component for the establishment of a state park at the confluence of the Clark Fork and Blackfoot Rivers in the area of the old Milltown Dam. Future acquisitions and development activities would be discussed and analyzed in additional environmental assessments.

2.2 Alternative B--No Action: FWP would not purchase four Milltown Park parcels

Under the No Action Alternative, FWP would not purchase the four parcels from TNC, and TNC would look for other conservation buyers that might meet their broader Montana Lands Project conservation goals. If no interested buyer is found, the property may be put on the real estate market for a private buyer (and potentially for limited residential use), and likely TNC would require a conservation easement to protect resource values. Public access would not necessarily be guaranteed by such an easement.

Previously dedicated Natural Resource Damage Program funds for this acquisition would be released to support different projects. Replacement of cost and injured natural resources subject to Montana v. ARCO would not be derived from this project.

The "No Action" alternative was considered but found unacceptable by the Design Team of the Milltown Park Concept Plan. The enhancement to the overall park plan by these four parcels would be lost. Also, the Design Team recognized the inevitability of public demand for additional access to the area, is critical in allowing consolidated access and management to the site.

2.3 Alternative Considered but Eliminated from Further Analysis--Conservation Easement

This alternative was not investigated since TNC is only interested in selling the parcels.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENT CONSEQUENCES

3.1 LAND USE

Over the past century, all of the Milltown Park parcels were subjected to some logging activities because of their close proximity to the lumber mills at Bonner and Milltown. There is a log recovery project occurring in the Blackfoot River near the Stimson mill site where the river was dammed for the old Bonner lumber mill. (Historically, logs were floated down the Blackfoot River to the dam, where they could be pulled into the mill for processing; over the years, hundreds of logs became water-logged and sunk in place behind the dam.) This effort is in association with the Milltown Dam Superfund cleanup efforts for the confluence area. Extraction equipment is accessing the river corridor through Parcel 2. Recovery of logs from the corridor is expected to last until spring run-off occurs. Access to this parcel is currently not open to the public until the extraction activities are completed for public safety reasons.

Under TNC's ownership, the parcels have been open for nonmotorized recreation such as hiking, wildlife viewing, and fishing. All parcels are enrolled in FWP's Block Management Program for walk-in hunter access for 2010. TNC has worked actively to reduce OHV trails on the parcels by installing gates or blocking pioneered (non-legal) trails with boulders or other barriers.

There are no existing structures on Parcels 2, 3, and 4. On Parcel 1, Bonner Hill, there is a water tank that provides a source of water to the Bonner School and Stimson Lumber if there is a fire. Stimson has a right-of-way across Parcel 1 along an access road from Highway 200 to the water tank and also has a lease agreement with TNC for the use and operation of the water tank and associated water lines.

All of the parcels are currently open for public access for nonmotorized recreation activities. Parcel 1, Bonner Hill, has an established trail system throughout its interior, and logging roads are also visible. There are primitive roads into Parcel 2, which provides access to its interior and to the river corridor.

Access points into Parcel 1 are located on its western and southern boundaries, where trailheads exist. Parcel 2 is accessible from the Cowboy Trail Road on its western boundary and along its shoreline with the Blackfoot River (via Montana's Stream Access Law). Parcel 3 is adjacent to Deer Creek Road, which is a County maintained road. Lastly, Parcel 4 is accessible by Highway 200 and its northern edge borders the Blackfoot River.

Proposed Action: Under FWP ownership, Parcels 2, 3, and 4 would continue to be managed as open space recreation areas with no immediate facility development. Timber harvest activities would cease unless dead or fallen trees pose a public safety risk, at which time those trees would be removed.

FWP would manage Parcels 2, 3 and 4 as open space recreation areas for hiking, mountain bike riding, fishing, and wildlife viewing. Motorized recreation, such as OHV use, would be prohibited, as would the cutting of firewood. Hunting is expected to be prohibited because of the parcels' limited size and close proximity to residential areas. However, the acquisition of these parcels would continue to provide access to approximately 1,800 acres of adjacent TNC and US Forest Service lands for hunting of white-tailed and mule deer, elk, black bear, and upland game birds. Additional analysis of recreational activities is discussed in Section 3.2.

Transfer of Bonner Hill (Parcel 1) to the School District is not expected to jeopardize the recreation opportunities currently enjoyed by local residents, although exact management plans for the parcel are currently under discussion. The anticipated FWP trail easement along the base of Bonner Hill would ensure it remains accessible if and when a comprehensive community trail system is developed.

A search of the Montana Bureau of Mines and Geology Abandoned and Inactive Mines database for Missoula County did not identify any old hard rock mines (gold, silver, etc.) within any of the parcels. All parcels are identified as being in the historic Clinton Mining District.

No mineral interests attached to the parcels would be transferred to FWP, since these are owned by a third party. Water rights attached to the project property would be transferred to FWP; however, a final determination of those interests is pending. Any existing road easements attached to the parcels would transfer to FWP.

No Action: Under the No Action Alternative, TNC would attempt to find another buyer for the parcels, which would increase the likelihood that the property could be used for residential development since the parcels are in close proximity to the communities of Bonner, Milltown, West Riverside, and Missoula. If the parcels were sold to a non-conservation buyer, such as the US Forest Service, some

previously allowable uses of the parcels may be maintained, reduced or eliminated depending upon the management plans of that organization.

3.2 Aesthetics and Recreation Opportunities

Historically, all the parcels were logged to supply the mills at Milltown and Bonner during the late 1800s and early 1900s. Since their transfer to TNC in December 2008, the parcels have been open space and available for nonmotorized public recreation, such as hiking, wildlife viewing and bird watching, mountain biking, hunting, and river-based activities, fishing and floating on the Blackfoot River.

There are FWP fishing access sites (FASs) upstream and downstream from the former Milltown Dam location and dam overlook on the Clark Fork River. Sha-Ron FAS is approximately 3 miles downstream from the overlook, whereas Turah FAS is approximately 5.5 miles upstream from the overlook. Along the Blackfoot River, Parcels 2 and 4 are between its confluence with the Clark Fork River and Weigh Station FAS, which is 2 miles upstream. Parcel 4 is adjacent to the western boundary of that FAS.

Angling pressure along the Blackfoot River from its confluence with the Clark Fork until it meets the Clearwater River near Clearwater Junction was reported as 23,300 angling days in 2009, which ranked it as the 6th busiest river in the FWP Region 2 and 35th within the state. As for the Clark Fork River, angling pressure between the Turah FAS and the dam area was 13,500 angling days for 2009.

The Blackfoot River currently receives substantial public use in the reach immediately upstream of the project area. FWP estimates public use at approximately 20,000 to 25,000 floaters, including anglers through the summer season in the lower reach of the Blackfoot River, from Johnsrud Park FAS to the Weigh Station FAS.

Proposed Action: With acquisition of the three Milltown Park parcels, FWP would start the momentum for the next steps for the development of a new state park at the confluence of the Blackfoot and Clark Fork Rivers guided by the Milltown Park Concept Plan. The acquisition would provide the public continuing opportunities for many outdoor recreational activities including wildlife viewing, fishing, hiking, mountain biking, and picnicking. The acquisition of these parcels would also provide access to approximately 1,800 acres of adjacent TNC and US Forest Service lands for hunting of white-tailed and mule deer, elk, black bear, and upland game birds.

The proposed acquisitions are expected to benefit a large number of visitors to the confluence area, due to its proximity to the communities of Missoula, West Riverside, Bonner and Milltown and the anticipated level of interest in the restored confluence area. FWP anticipates redistribution of angling pressure downstream of Weigh Station FAS with the acquisition of Parcels 2 and 4 along the Blackfoot River. The addition of Parcel 2 would provide floaters with additional access to the Blackfoot River.

FWP would continue with the management of the parcels for open year-round nonmotorized recreation. Firewood cutting, OHV trail riding, and camping would be prohibited. Hunting would be prohibited because of the parcel's limited size and close proximity to residential areas. In the future and as the development of the park facilities is initiated, FWP plans to evaluate all recreational opportunities within the park as it develops a formal management plan for the site.

The parcels would contribute to the new state park's long-term plans to serve as a hub for a trail system that would connect to Missoula and Turah. The existing trails would eventually link up with a planned trails system, which is yet to be constructed, within the Milltown Reservoir remediation and restoration project area. These new trails cannot be constructed until remediation and restoration is complete. The Kim Williams Trail, owned by the City of Missoula immediately downstream of the proposed project area, is by far the most popular and heavily used trail in the greater Missoula area trail network.

The purchase of the four Milltown Park parcels would protect them from subdivision and residential development and would ensure the forested mountain viewsheds for the valley communities to enjoy. The acquisition of the parcels by FWP would also provide buffer zones between developed areas and wildlands for the benefit of wildlife species. Preservation would protect riparian resources, wildlife habitat including winter range for the bighorn sheep herd resident to the area, and visual resources. Parcels 2 and 4 would also provide managed public access along the river, extending public access from the Blackfoot greenway on the north side of the river.

FWP anticipates that visitor use of the new park would be moderate to high depending upon the season. With the configuration of the park and limited resources, there will be challenges associated with managing recreation on the property. These challenges could be related to: public safety, law enforcement coverage, emergency response services, vandalism, maintenance, noxious weed management, and resource protection. For the immediate future, existing FWP staff based out of Missoula plus the proposed Park Manager and maintenance worker would manage the Milltown Park property.

Recreation would be managed in accordance with applicable FWP rules and regulations, including the Parks Biennial Fee Rule, Commercial Use Administrative Rules, and Commercial Use Permit Fee Rule. FWP would install appropriate boundary and regulation signage, and additional site information would be available via brochures and FWP's Montana State Parks website (<http://fwp.mt.gov/parks/>, accessed 27 Oct 2010) to inform the public of the recreational opportunities and activities within the park.

Current recreational opportunities on Bonner Hill (Parcel 1) are expected to remain available to the public until such time as the School District decides on any changes.

No Action: If FWP decides not to purchase the parcels, TNC would likely continue its search for other buyers. Existing recreation opportunities would likely be available to the public if the parcels were sold to another state agency or a federal agency.

Future access for public recreation activities on the parcels under private ownership would be difficult to analyze since it is unknown what a new owner(s) might do. Public access on the parcels could be decreased or eliminated depending upon the desires of the new owner.

3.3 Vegetation

Coniferous forest comprises approximately 95% of the target property. Forest types include predominately ponderosa pine (*Pinus ponderosa*) and Douglas-fir (*Pseudotsuga menziesii*), but aspen (*Populus tremuloides*) and western larch (*Larix occidentalis*) are present in limited quantities. The underbrush includes snowberry (*Symphoricarpos albus*), kinnikinnick (*Arctostaphylos uva-uris*), and ninebark (*Physocarpus malvaceus*). Much of the conifer forest habitat on the parcels has been harvested

in the past because the properties were owned by local timber mills. There are no visible infestations of bark beetle on the parcels.



Figure 2. Southern boundary of Parcel 2 with the Blackfoot River in the foreground.



Figure 3. Forested landscape of Parcel 3.

Elevations range from 3,200 feet near the Blackfoot River up to 4,100 feet at Bonner Hill. The majority of the forested areas range from 30-60% slopes, with limited areas of Parcel 2 and 3 nearly level and areas within Parcel 2 possessing slopes up to 80%.

Riparian habitats currently exist in limited quantity on the Blackfoot River shorelines adjacent to Parcel 2 and 4. Species present include willow and other herbaceous plants.

Invasive weed species are present in limited areas within all the parcels. Exotic weed species include spotted knapweed (*Centaurea maculosa*), leafy spurge (*Euphorbia esula*), common hound's-tongue (*Cynoglossum officinale*), and Canada thistle (*Cirsium arvense*). TNC has done some recent weed management activities to control existing noxious infestations on Parcels 1 and 2.

Proposed Action: FWP acquisition of the three proposed Milltown Park parcels would prevent further impacts from industrial timber harvest and recreation activities within the riparian areas and provide opportunity for future riparian corridor restoration activities. Regionally, riparian corridors are most threatened by residential development and industrial timber harvest activities.

Wildfires would be subject to immediate suppression upon detection. Fire suppression on the Milltown Park parcels would fall under the jurisdiction of DNRC.

If FWP were to acquire the three Milltown Park parcels, FWP would agree on a Weed Management Plan specific to the remaining Milltown Park parcels with Missoula County Weed District that would be in accordance with the FWP's Integrated Noxious Weed Management Plan (2008) and the FWP Region 2 Parks Division Weed Management Implementation Plan (2010). In accordance with § 7-22-215, MCA, the FWP is required to have the property inspected and develop a site-specific noxious weed management plan agreement in cooperation with the weed district. Any isolated patches of invading

species would be eradicated by the most efficient and effective means (e.g., hand-pulling, digging or herbicide spot treatment), depending on weed species and site limitations. FWP's priority for herbicide control of noxious weeds on the subject lands would be to spray roadsides and previously disturbed areas. Roadsides would be inspected annually for the purpose of detecting and eradicating any new weed introductions before infestations become established. As an additional preventive measure, FWP would confine motorized traffic to the previously described road system and would otherwise avoid disturbance of the soil surface.

The existing conifer forest on Bonner Hill, Parcel 1, would likely remain intact due to the NRDP deed restriction terms that protect the existing resources values. Noxious weed management of Bonner Hill would be under the jurisdiction of the School District.

No Action: If TNC retained the parcels and sold it to another conservation buyer, there could be potential impacts to the vegetation resources (e.g., timber management) depending upon who the new landowner was and their intended management of the landscape. If TNC sold the parcels to a private buyer the exact level of this risk is unknown since the future impacts to resources and public access would be dependent on the desires of the property's new owner(s). It is difficult to predict how new ownership would affect existing vegetation and wildlife habitat resources since actual landowner activities are unknown. There is the potential for residential development, which could negatively impact habitat for wildlife species and the forested view-shed.

3.4 Wildlife Species

Even with a high level of human presence and being bisected by Interstate 90 and a Montana Rail Link railroad line, the Clark Fork and Blackfoot Rivers confluence area is within an important ungulate and large carnivore movement corridor between the Salmon-Selway ecosystem southwest of Missoula and the Northern Continental Divide ecosystem northeast of Missoula, with the preferred routes traversing the Bitterroot Mountains to the north end of the Sapphire Mountains, passing west of the Rattlesnake Wilderness area (Walker and Craighead 1997, American Wildlands 2008). Species known to use corridor are white-tailed deer, black bear, mountain lions, grizzly bear, and gray wolf.

FWP's Region 2 Wildlife Management Specialist reports that despite Parcels 1, 2, and 4's proximity to human development, the parcels are used heavily by mountain lion, black bear, elk, and white-tailed deer. Additionally, the parcels are frequented by moose and wolf of this region, and a wolverine was trapped nearby at higher elevations.

Parcel 2 is along the north side of the Blackfoot River, across the river from the former Stimson Mill. This parcel includes over 4,500 feet of frontage along the Blackfoot River. This parcel supports various ungulates species, including bighorn sheep, elk, and white-tailed deer, as well as frequent moose use of the Blackfoot River corridor.

Parcel 3 includes a 20-acre parcel between the Milltown Dam Overlook and Deer Creek Road. The heavily wooded parcel provides habitat for white-tailed deer and various small mammals and avian species. Although this parcel does not include river frontage to the Clark Fork River, it provides an access point for wildlife species to the river valley and confluence area.

Parcel 4 consists of approximately 11 acres of land immediately south of the Blackfoot River and upstream of the former Stimson Mill. The parcel includes approximately 1,300 feet of Blackfoot River frontage, including a bedrock outcrop that has been a popular destination for the anglers. The land is divided by Highway 200 and also includes the relatively steep forested hill side overlooking the highway to the south. This parcel connects lands currently owned by FWP upstream on the Blackfoot River at the Weigh Station Fishing Access Site with Parcel 1, described above, to the south.

The Blackfoot River's riparian habitats provide seasonal and year-round use by a variety of species, including great blue herons, bald eagle, osprey, Canada goose, mallard, common merganser, pileated woodpecker, belted kingfisher, great horned owl, and many other small mammal, amphibian, and avian species.

A list of sensitive species observed on or nearby the property, or likely to occur based on species distribution range and habitat suitability, is included in Table 1.

Proposed Action: FWP acquisition of the three Milltown Park parcels would ensure connectivity between the nearby Sapphire and Rattlesnake Mountains for wide-ranging native species, such as grizzly bears, black bear, elk, and white-tailed deer. FWP acquisition would protect and potentially, lead to the enhancement of riparian corridors important to migratory songbirds, small mammals, amphibians, and aquatic species (fish species are described in Section 3.4).

Preservation of Parcel 2 would protect riparian resources, wildlife habitat including winter range for the bighorn sheep herd resident to the area. To mitigate possible impacts to bighorn sheep, and for the benefit of multiple species, FWP recommends a seasonal closure from December 1st - May 15th for this parcel. The closure would provide secure winter range for bighorn sheep, white-tailed and mule deer, and elk. Although elk and mule deer do not utilize habitat on Parcel 2, new public access from this property to thousands of acres of public land to its north would be detrimental to those populations. By having the closure go until May 15th, it allows bighorn sheep to access important, secure lambing habitat across from the Check Station Fishing Access Site (FAS) before the general public begins using the property and its adjacent lands. Disturbance during the winter and the last trimester of calving and lambing would remain almost status quo with current levels of disturbance.

All four parcels include highly desirable lands for residential development. Parcel 2 is zoned for residential development and the other parcels are not zoned by the County. Views of the rivers and confluence area, forested landscape, and their close proximity to the communities of Bonner, West Riverside, and Missoula only add to their attractiveness.

FWP management of Parcels 2, 3 and 4 would maintain current nonmotorized recreation opportunities and wildlife viewing opportunities, but prohibit hunting. No impacts are expected to wildlife species if the proposed action is approved.

Transfer of the 102-acre Bonner Hill (Parcel 1) to the School District is not expected to influence the habitat of resident wildlife or impact the movements of transient species because of its use being restricted by the NRDP grant terms.

No Action: If no action were taken by FWP, TNC would look for another conservation buyer, in which the current wildlife resources (e.g., diversity, habitat, etc.) may be maintained and the impacts would be minimal if any.

If the parcels were sold to a private buyer, important local habitat for a host of game and nongame wildlife species might be impacted, an important corridor between the Sapphire and Rattlesnake Mountains wildland complexes could be compromised, and the subject lands would be put at greater long-term risk of residential development. Furthermore, historic public access to the parcels and through them to large tracts of adjacent public lands could be lost. Exact level of risk of loss of habitat and public access are unknown, since they are dependent on the desires of the new property owner(s).

3.5 Fisheries Species and Water Resources

The Blackfoot River is one of twelve renowned “Blue Ribbon” rivers in Montana and a major tributary of the Clark Fork River. The river begins near the Continental Divide and flows 132 miles to its mouth at Bonner, where it merges with the Clark Fork. Fish species present in the Blackfoot River include rainbow trout, brown trout, mountain whitefish, brook trout, westslope cutthroat trout (Montana Species of Concern), bull trout (threatened species under ESA), various sucker and sculpin species, redbelt shiner, longnose dace, northern pikeminnow, peamouth, and others.

Milltown Park Parcels 2 and 4 have river frontage, 4,500 feet and 1,300 feet respectively, to the Blackfoot River.



Figure 4. View of the Blackfoot River at the northern boundary of Parcel 4.

Floodplain: The shorelines of Parcels 2 and 4 with the Blackfoot River are identified as being within the 100-year floodplain by US Federal Emergency Management Agency floodplain map database. Parcels 1 and 3 are not adjacent to nor do they include bodies of water.

Water Rights: A search of the Montana Department of Natural Resources and Conservation water rights database identified no water right records associated with the Milltown Park parcels.

Proposed Action: FWP acquisition of Parcels 2 and 4 would protect more than 5,800 feet riverine riparian habitat along the Blackfoot River. The acquisition would facilitate the expansion of an active public/private stream restoration program along the Blackfoot River drainage.

The project would have no impacts on fisheries habitat, fish passage or aquatic species.

No Action Alternative: If FWP decides not to purchase the parcels, it is unknown how fisheries and water resources (riparian areas) would be affected by another buyer's future management after TNC sells the parcels, especially for Parcels 2 and 4 with their river frontage.

3.6 Cultural and Historic Resources

Much of the breadth of western history can be traced through the Two Rivers confluence, beginning with the last collapsing ice dam that unleashed Glacial Lake Missoula floods some 13,000 years ago, and concluding with the removal of the Milltown Dam and the restoration of Two Rivers Confluence.

In 1854, Captain John Mullan surveyed through the site of Milltown and in 1858-61 carved the Mullan Trail from Walla Walla, Washington to Fort Benton, Montana (The Bicentennial Committee Bonner School, 1976). It wasn't until the mid-1880s that the towns of Bonner and Milltown were established when lumber mills were established to provide timber for the Northern Pacific Railroad. In the early days, most of the population of these communities was comprised of Swedes, Norwegians, and Finns, with smaller numbers of Scots, Irish, and Germans.

Although the timber mills dominated the area for decades, the building of the Milltown Dam across the Clark Fork River in 1905-06 provided employment to many residents and attracted many new ones. The hydro-electric dam was built to provide the growing electric system in Missoula additional energy and also was used to establish an interurban railway service between Bonner and Missoula. Many houses built by the mill for its employees still remain in Bonner and Milltown.

There are known Tribal cultural resources in the vicinity of the former Milltown Dam Reservoir, and within the project area. The Bonner-Milltown area was an important junction on the trail to the east across the mountains toward Potomac. The confluence area was an important camp, rendezvous, and fishing area for native peoples (The Bicentennial Committee Bonner School, 1976).

The Confederated Salish and Kootenai Tribes are trustees of natural resources within the project area as a result of rights associated with the 1855 Hellgate Treaty. The Tribes have been active partners in developing the Restoration Plan for the Clark Fork River and Blackfoot River near Milltown Dam since October 2005.

Proposed Action: FWP's proposed acquisition would likely have a positive effect on any cultural or historical resources by securing and managing them in public ownership. By Montana law (22-3-433 MCA, Montana Antiquities Act), all state agencies are required to consult with the State Historic Preservation Office on the identification and location of heritage properties on lands owned by the state that may be adversely impacted by a proposed action or development project.

No Action: If TNC sold the parcels to either a state or federal agency, historical resources within the parcels would be protected by either the Montana antiquities laws (22-3-4 MCA) or the applicable federal laws, including the National Historic Preservation Act of 1966. If the parcels were sold to a private party, it is unknown if or at what level historic sites would be affected.

3.7 Community and Taxes

All of the Milltown Park parcels are within a two mile radius of the unincorporated community of Bonner, Montana. Since Bonner is unincorporated, an estimation of population of the immediate area is difficult to define. However, the School District estimates the population of the immediate area (Bonner, Milltown, Piltzville, and West Riverside) to be 1,800.

For most of the 20th century, the economies of Bonner and Milltown centered on their timber mills, but with the closure of the Stimson Lumber mill in 2008, both communities have been struggling. As an indicator of the economic climate of the local community, there are 380 children attending the Bonner School (K-8th grade) and 60% are receiving assistance through a reduced-cost meals program.

In 2005, the leadership of Missoula County completed updates to their 2002 Growth Policy to provide guidance for decision-making for community and economic development, transportation management, public facilities, and natural resource management. Many of the Plan's community goals and objectives integrate preserving and improving the natural environment within Missoula County. The Natural Environment Goals are 1) create sustainable relationship between human activities and natural systems and 2) protect the natural environment and improve it where degradation has occurred. Goals that are noteworthy are: #6 Protect existing wetlands and restore historic wetlands wherever possible, #9 Protect areas critical for wildlife survival and minimize impacts on less critical wildlife, #11 Preserve and enhance the urban forest, #12 Minimize noxious weeds, and #13 Preserve area with scenic open space value.

Property taxes assessed on the parcels totals \$682 per year based on the County's current tax assessment.

Proposed Action: The proposed acquisition of the Milltown Park parcels is not expected to have any negative affects to the communities of Bonner, Milltown, or West Riverside. There is the potential that if the establishment of the anticipated new state park near the confluence area is completed, as well as the trail system connecting the park with Missoula, the local communities could experience an influx of visitors going to the park. This influx may spur new economic develop and recreation-based businesses to emerge, in those communities.

The proposed acquisition by FWP would be consistent with the goals of the Missoula County Growth Plan in that scenic and natural places within the county would be preserved for future generations of residents to enjoy. Wildlife habitat important to bighorn sheep and the wildlife corridor between the Sapphire and Rattlesnake Mountains would remain available to migratory species. Furthermore, there are additional goals and objectives specific to cultural and historic resources and development patterns identified in the Growth Plan that would be reached through FWP's acquisition of the Milltown Park parcels.

Purchase of the Milltown Park parcels by FWP for a state park and the donation of Bonner Hill to the Bonner School District would prohibit future subdivision of the property and potential revenues to the county that would result. However, preclusion of subdivision would also save the county from having to provide services (public safety, etc.) to newly developed areas. Of the four parcels, only a portion of Parcel 2 has been zoned by the County. Its zoning, C-A1, encourages the continuing use of the land for

recreation and natural resource production and limits residential density to one dwelling per forty acres. The others are not zoned.

The actual amount of property taxes paid to the County is expected to change. FWP is required by law to make tax payments to counties equal to the amount that a private landowner would be required to pay per Montana Code 87-1-603. Taxes would total approximately \$453.00 per year for the remaining three parcels (#2, #3, and #4) and would be paid from existing FWP accounts. Taxes for Parcel 1, Bonner Hill, are \$229 and these tax revenues would be lost to the County since school districts are exempt from paying property taxes, although they are required to pay special taxes for sanitation and similar services.

No Action: If the property were sold to a conservation buyer, taxes paid to the County would likely remain the same as they are now. If the parcels were sold and used for limited residential development, the amount of tax revenue paid to the County could be higher than the current level but the exact amount of change is difficult to predict at this time.

3.8 Cumulative Impacts

Proposed Action: The proposed purchase would contribute to the long term preservation of wildlife movement corridors between the Sapphire and Rattlesnake Mountains for wide-ranging wildlife such as wolverine, elk, grizzly bear, mountain lion, and other species in an area where residential development is a threat to the remaining open space.

Similarly, the long term protection of riparian areas along the Blackfoot River and would assist in any future fisheries habitat restoration activities initiated by FWP to improve habitat quality for native trout populations, as well as other aquatic and terrestrial species.

Continuing public access to the subject lands would maintain the existing recreational opportunities, such as hiking, wildlife viewing, mountain bike riding, and fishing. The proposed acquisition would also complete the first step for the plans of establishing a new state park at the confluence of the Blackfoot and Clark Fork Rivers. Which in turn, local and regional economies and lifestyles tied to the unique presence of expansive fish, wildlife, and recreation resources would be maintained and likely enhanced.

With the completion of the acquisition and donation of Bonner Hill to the School District, the remaining Milltown Park parcels would become available for the implementation of next phase of the Milltown Park Concept Plan; the development of park facilities. Impacts of the development phase would be described and analyzed in another environmental assessment. However, over the long term, some impacts to the human environment are anticipated and would likely be mitigated through the FWP's Best Management Practices for construction of facilities and the management of the Park for the benefit of the public and wildlife and fisheries species.

Economic impact to the County and the local areas are expected to be mostly positive over the long term with the establishment and development of the Milltown Park and the extended trail system. However, since Parcel 1 would be transferred to the Bonner School District, there would be an annual reduction of \$229 in property tax revenue to the County.

No Action: The implementation of the No Action alternative would eliminate these parcels from the broader development plans for the Milltown Park and confluence area, but it would not impact the long term plans for the establishment the Park at the confluence of the Blackfoot and Clark Fork Rivers since additional lands are expected to be available after the completion of the remediation and reclamation work at the former Milltown Dam Reservoir.

If no action were taken, wildlife habitat and forested areas may be jeopardized or manipulated depending upon the new landowner's plans. If the lands move under public ownership, impacts to vegetation, wildlife, fisheries, and public access could be minimal and meet many of the goals and objectives of the Missoula County Growth Plan for its natural resources. The wildlife corridor between the Sapphire and Rattlesnake Mountain may be protected from development and ensure a forested viewshed in perpetuity.

If the parcels were sold to private buyers, their existing natural resource values could be impacted if they were developed for residences, even with a protective conservation easement. Wildlife movements may change to navigate around newly developed sites and public access into the parcels and on to adjoining public lands may be either be allowed or prohibited. Predicting long term changes of the parcels' management under private ownership is not easy to forecast.

4.0 RESOURCE ISSUES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS

The Montana Environmental Policy Act (MEPA) provides for the identification and elimination from detailed study of issues, which are not significant or which have been covered by a prior environmental review, narrowing the discussion of these issues to a brief presentation of why they would not have a significant effect on the physical or human environment or providing a reference to their coverage elsewhere (ARM 12.2.434(d)). While these resources are important, FWP anticipates they would be unaffected by the proposed action or if there are any effects, those influences could be adequately mitigated as a result these resources were eliminated from further detailed analysis.

4.1 Soils

A query of the US Department of Agriculture's (USDA) Soil Survey database of the Milltown Park parcels identified only 10 different soil types throughout the parcels and is dominated by gravelly loams. Soil types identified included Orthents, Repp very gravelly loam, Tally sandy loam, Winkler gravelly loam, Perma stoney loan, and Winkler-Rubble land complex. . (USDA Soil Survey database, 10/8/10)

None of the Milltown Park parcels include Prime or Unique farmland as designed by the US Agricultural Department.

No impacts are anticipated to the parcels since no ground disturbing activities are planned by FWP or the Bonner School District.

4.2 Air Quality

Under either alternative, changes to the ambient air quality are unlikely since neither FWP nor the School District have immediate plans for construction or development which could affect particulate levels and air quality.

4.3 Noise and Electrical Effects

Since TNC ownership, the parcels have only been open to nonmotorized recreational activities. Traffic noise from Interstate 90 or Highway 200 can easily be heard from Parcels 2-4. Noise levels at Parcel 1 are minimal since its boundaries are not directly adjacent to a major traffic corridor. The potential for changes in noise levels would depend on the FWP's and the School District's authorized recreational activities within their parcels and the intensity of those activities in a specific location. It is likely both organizations would limit motorized activities within their parcels, so ambient noise levels are expected to remain at existing levels.

Existing utility easements (electrical, telephone, etc) would not be affected by either alternative.

4.4 Risk and Health Hazards

As part of FWP's due diligence, the Department would complete a hazardous materials survey prior to the property's acquisition. A hazardous materials survey was completed in 2008 and FWP is working to have that surveyed updated in the near future.

5.0 NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT

Based on the significance criteria evaluated in this EA, is an EIS required? No. Based upon the above assessment, which has identified a very limited number of minor impacts from the proposed action, an EIS is not required and an Environmental Assessment is the appropriate level of review.

6.0 PUBLIC PARTICIPATION

6.1 Public Involvement

Planning Process:

The Milltown Redevelopment Working Group, in cooperation with the Department of Fish, Wild life and Parks, Missoula County and the National Park Service Rivers and Trail Conservation Assistance Program considered several design alternatives during the intensive park design process conducted in 2007. A Design Team was convened for an intensive design workshop, comprised of local and county residents, area youth, stakeholder interest groups, natural resource and recreation management agencies, and the Confederated Salish and Kootenai Tribes.

Public opinion was solicited during the design work shop and immediately following its completion to find out what the public liked and did not like about each proposal. Following the workshop, a second round of public meetings was conducted and the two design alternatives were presented for public comment. After the public meetings, the Milltown Redevelopment Working Group discussed the design options and public comment over the course of several meetings and finally settled on a revised version of the low intensity development alternative.

The Working Group members gave presentations to, among others, the Bonner School Board, the Bonner Community Council, community groups, City and County officials and agencies, emergency

services personnel, college students, and community access television. This plan was ultimately presented to the Missoula County Commissioners, who unanimously endorsed it in July, 2008.

Current Environmental Assessment:

Public notification of the EA release and opportunities to comment will be by:

- A statewide press release
- Two legal notices in each of these newspapers: *Independent Record* (Helena) and *Missoulian*;
- Direct mailing to adjacent landowners and interested parties;
- Public notice and posting the EA on the Fish, Wildlife & Parks web page: <http://fwp.mt.gov> (“Recent Public Notices”).

Copies of this EA will be available for public review at FWP Region 2 Headquarters in Missoula and on the FWP web site.

A public meeting will be held on November 10th from 6:30 p.m. to 8 p.m. at the Bonner School Library. This meeting is co-sponsored with the US Environmental Protection Agency and topics planned for discussion include status updates on the remediation, restoration, and redevelopment of the Milltown Dam area. At this meeting, the public will have an opportunity to have questions answered by FWP staff and submit comments about the proposed Milltown Park acquisition.

This level of public notice and participation is appropriate for a project of this scope having few limited physical and human impacts.

6.2 Duration of Comment Period

The public comment period will extend for thirty (30) days beginning October 28, 2010. Written comments will be accepted by FWP until 5:00 p.m., November 26, 2010 and can be mailed to the address below:

Milltown Park Acquisition
Montana Fish, Wildlife & Parks
Region 2 Headquarters
3201 Spurgin Rd.
Missoula, MT 59804

or email comments to: MilltownPark@mt.gov

or phone comments to: 406-542-5540

6.3 Timeline of Events

Environmental Assessment Public Comment Period	October 28 - November 26, 2010
EA Submitted to FWP Commission	December 9th
EA Submitted to MT Land Board	December 20th

6.4 Offices/Programs contacted or contributing to this document:

Bonner School District, Bonner, MT
Missoula County Assessor Office, Missoula MT
Montana Fish, Wildlife & Parks:
 Lands Bureau, Helena
 Legal Bureau, Helena
 Parks Division, Helena and Missoula, MT
 Wildlife and Fisheries Division, Missoula
Montana Department of Natural Resources and Conservation, Helena MT
Montana Natural Heritage Program, Species of Concern database
Natural Resource Damage Program, Montana Department of Justice, Helena MT
The Nature Conservancy, Missoula, MT
US Department of Agriculture, Soil Survey Database
US Fish and Wildlife Service, Wetlands Database

7.0 EA PREPARATION

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Rebecca Cooper, FWP MEPA Coordinator, Helena, MT
Kristi DuBois, FWP Non-game Wildlife Biologist, Missoula, MT
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Vickie Edwards, FWP Wildlife Biologist, Missoula MT
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Pat Saffel, FWP R-2 Fisheries Manager, Missoula, MT
Sara Scott, FWP Heritage Resources Specialist, Lolo MT
Roger Semler, FWP Parks Division Operations Bureau Chief, Helena MT

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